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ILLINOIS COMMERCE COMMISSION

Before the  
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ILLINOIS  
COMMERCE COMMISSION  
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In the Matter of the Petition of )  
SCC Communications Corp. )  
for Arbitration Pursuant to Section 252(b) )  
of the Telecommunications Act of 1996 )  
to Establish an Interconnection Agreement )  
with SBC Communications Inc. )  
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CHIEF CLERK'S OFFICE

Docket No. 00-0769

**AMERITECH ILLINOIS' REPLY TO EXCEPTIONS OF**  
**SCC COMMUNICATIONS CORPORATION**

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Dated: March 5, 2001

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Illinois Bell Telephone Company ("Ameritech Illinois") respectfully submits its brief in reply to the exceptions of SCC Communications Corporation ("SCC") in the above-captioned arbitration. SCC takes exception to the Hearing Examiners' Proposed Arbitration Decision ("HEPAD") on two issues: Issues 1.B.1 (Advanced Services: Acceptability for Deployment), and 6.C (Bona Fide Request Process). In its own exceptions brief, Ameritech Illinois set forth its position on Issue 1.B.1, and we will not repeat that discussion here.<sup>1</sup> Rather, this brief focuses solely on Issue 6.C, and applies only if the Commission decides (notwithstanding Ameritech Illinois' objection, as set forth in its exceptions brief, that the Commission lacks subject matter jurisdiction) to reach the specific issues presented for arbitration.

SCC's "exception" on Issue 6.C is not really an exception at all. SCC doesn't say what, if anything, the HEPAD did wrong. In fact, SCC offers no evidence and makes no affirmative

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<sup>1</sup> Similarly, Ameritech Illinois has already demonstrated in its own exceptions that the Commission has no jurisdiction to address issues 1.B.1 and 6.C, SCC's exceptions on them, or any of the other specific issues submitted for arbitration. While we respectfully disagree with the exceptions of Staff on the jurisdictional question, we have already fully briefed our position in our exceptions and we will not repeat those arguments in this brief.

allegation whatsoever. All SCC offers is a hypothetical: “[I]f an affiliate of Ameritech Illinois, acting as a competitive LEC, secures from the incumbent LEC a UNE or UNE combination without having to submit a BFR, Ameritech Illinois must make that UNE or UNE combination available to SCC without forcing SCC to submit a BFR.” SCC Exceptions Br. at 5 (emphasis added).

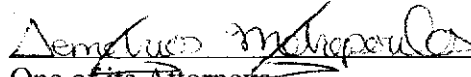
SCC does not show, or even say, that it has satisfied the condition its own brief describes. There is absolutely no evidence in the record that any affiliate of Ameritech Illinois has ever secured *any* UNE or UNE combination without having to submit a BFR (much less that the same arrangement has not been offered to SCC). Even now, SCC does not allege that any such thing has ever happened. SCC has left out the most important step in its hypothetical: If an affiliate of Ameritech Illinois has ever obtained the arrangement posited by SCC, SCC must bring that arrangement or agreement to the attention of Ameritech Illinois and the Commission. Only then can the Commission can evaluate that arrangement and decide whether it should be offered to SCC pursuant to the merger conditions. Until then, all SCC has asked for is an advisory opinion, and all it has provided is a hypothetical question without the specifics and factual context the parties and the Commission would need to answer it. Thus, there is no basis in the record on which to decide whether or not SCC’s hypothetical is true, and no reason to modify the HEPAD.

Dated: March 5, 2001

Respectfully submitted,

AMERITECH ILLINOIS

By:

  
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**CERTIFICATE OF SERVICE**

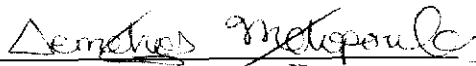
I certify that I caused copies of the foregoing Ameritech Illinois' Post-Hearing Brief to be served on this 5<sup>th</sup> day of March, 2001, on the following persons by overnight delivery:

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